Technical Assistance for Public Water Systems

The Idaho Drinking Water Newsletter

Department of Environmental Quality Idaho Drinking Water Program

June 2005, Number 36

This is the first in a series of articles outlining standardized protocol for coliform sampling

Reviewing coliform sampling procedures

The Total Coliform Rule (TCR) has been in effect since the late 1980s, which means that water system operators, drinking water laboratories, and regulatory folks all have a lot of experience with this rule. However, it seems about every five years or so . . .

variations begin to appear around the state in the way samples are taken, what they are called, how they are reported, and how water system operators respond to sample results.

These procedural differences cause confusion and can result in unnecessary violations of the rule.

The objective of this series of articles is to outline a standardized protocol for coliform sampling so that system operators, laboratories, and regulators will all be reading from the same page. DEQ is asking for cooperation from all three of these groups as we attempt to achieve consistency and simplicity in this important activity.

It all begins with the sample submittal form . . .

Coliform sampling is a regulatory activity that creates a legal record. A public water system's compliance with the TCR is based on that record. The first step in this process is filling out the water sample submittal form, legibly and completely. **This is the responsibility of the public water system.**

Even after ten years of practice, it is amazing how many submittal forms lack the required information or are so poorly executed that they cannot be read.

Errors at this point in the process, if left uncorrected, persist through reporting of results and subsequent sampling activities.

As a courtesy to their customers, laboratories often follow-up by phone with water system personnel in order to clarify and complete the submittal form, but it is really not the laboratory's job to do this.

Some suggestions on preventing some of the common errors are listed below.

- ❑ **Write legibly.** Fill out the water system name, address, and PWS # before leaving for the field, if doing so will make it easier to write legibly and get the information right.

- ❑ **Mark sample as public water system.** Make sure the sample is identified as a public water system sample (check the box that is provided on the form).

- ❑ **Note the time, date, and location of the sample.** ***At the time the sample is actually taken,*** write down the date, time, and location of the sample on both the submittal form and the sample bottle (in case paperwork and sample become separated).

  People who take multiple samples must be particularly careful about this. Waiting until later to complete this task can result in sample mix-ups and improper addressing.

  The location of the sample will be used as the starting point for problem solving and corrective action should the sample turn out to be positive. An incorrect address could lead you on a wild goose chase.

Coliform sampling in calendar years 2003 -2004

In the past two calendar years, public water system operators collected the following coliform samples:

2003 - 27,994 **2004 - 28,944**

- ❑ **Take chlorine residual reading for each coliform compliance sample.** If your system practices disinfection, remember to take a chlorine residual reading each time you take a coliform compliance sample (including repeat samples).

  Write the chlorine residual in the space provided on the form so that your system will receive credit for compliance with the Stage 1 Disinfectants and Disinfection

see ***Coliform Sampling****, page 2*

Coliform Sampling, from page 1

By-Products Rule and the various surface water treatment rules.

- ❑ **Include the sample type.** Remember, it is very important **to include the sample type.** Abbreviations for the various sample types are given on the submittal form.

Sample types you may have heard of could include "routine," "repeat," "check samples," "confirmation samples," "follow-ups," "non-compliance," and perhaps other names as well. How many of these sample types do you think are actually mentioned in the Total Coliform Rule?

The next article in this series will answer that question and discuss the way each sample type is used, both to determine compliance and to assist you in providing safe water to your customers. ■

Op Cert Notes

- **Renewal dates now based on birth dates.** March 1, 2005, marked the end of using a single annual renewal date for drinking water operator certification licenses. Licenses issued after March 1 will be renewed annually based on the operator's birth date.

- **All operators must have current license.** Licensed operators must have a current license to operate a public water system. There is no grace period to operate a public water system with an expired license.

- **PWSs must be classified every 5 years.** Public water systems are to be classified at least every 5 years, more frequently if the system is being modified. Owners of public water systems can print classification worksheets from the internet at: http://www.idahocertificationtraining.com/dw_class_dist.doc or have worksheets sent from DEQ upon request.

- **"Very small water system" defined.** A "very small water system" is a small groundwater system with no treatment other than disinfection.

- **No substitute operator available, then what?** If a substitute responsible in charge operator is not identified, the responsible in charge operator must be available at all times. If this situation changes, the owner of the system must provide DEQ the name and information of the substitute responsible in charge operator. ■

Sanitary survey inspection forms updated

Idaho has updated its sanitary survey inspection form for public drinking water systems. DEQ felt revision was necessary in order to make Idaho's sanitary survey more consistent with federal and state drinking water rules and more useful to the systems inspected.

DEQ also developed a training program for inspectors based on the new sanitary survey form in order to make inspections consistent throughout the state. In March at a workshop in Boise, more than 50 inspectors received training on the updated survey.

DEQ will use the training program for all new inspectors, and will update the program whenever there are drinking water rule changes or as other modifications become necessary. ■

See inserted form ——►

Community and NTNC Systems must file Responsible Charge Operator Report

All Community and Nontransient Noncommunity public water system owners must notify DEQ of the following:

1) responsible charge operator, and

2) substitute responsible charge operator by submitting a "Public Drinking Water Program Responsible Charge Operator Report" form.

To submit the report, owners may use one of the options below:

- use the Responsible Charge Operator Report *form insert found in this newsletter* with the prepaid postage mailer on the back, or
- download a copy from the DEQ's web site at http://www.idahocertificationtraining.com/dw_responsible_charge_form.doc, or
- request a copy from DEQ by contacting Joan Thomas at (208) 373-0409.

Please note that it is no longer necessary to have this form notorized. DEQ has removed that requirement.

Remember this form must be submitted by the owners of all community and nontransient noncommunity public water systems. Owners will be required to submit this form anytime there is a change in either operator. ■

Responsible Charge Operator Report

Idaho Public Drinking Water Program

Fill out a separate form for each treatment and distribution system

Public Drinking Water System information:

Public Drinking Water System Name
(Legal Name of Record) _____

Public Water System Number _____

Owner of Record or Responsible Legal Party _____

Mailing Address of System

Street_____ City _____ State _____ Zip _____

Physical Address of System

Street_____ City _____ State _____ Zip _____

System Classification Information:

Public Water System Type (Check one, then check appropriate class below): ❑ Treatment ❑ Distribution

Public Water System Class (Check one):

❑ VSWS ❑ Class I ❑ Class II ❑ Class III ❑ Class IV ❑ Class Unknown

Responsible Charge Operator:

As the owner or owner's designee of the public drinking water system identified above, I understand it is my responsibility to designate a properly licensed person (or persons) to be Responsible Charge Operator(s), depending on the size and nature of the system, to directly supervise the performance of operations and employees on a daily basis at such times that the system is in operation. I further understand it is my responsibility to designate a properly licensed person (or persons) to be Substitute Responsible Charge Operator(s) to perform the duties of the responsible charge operator in their absence.

I have designated the following person(s) as Responsible Charge Operator(s) for this system.

Responsible Charge Operator _____

License Number _____

Responsible Charge Operator _____

License Number _____

Substitute Responsible Charge Operator:

I have designated the following person(s) as Substitute Responsible Charge Operator(s) for this system.
(**NOTE:** A substitute must be a different person than the Responsible Charge Operator).

Substitute Responsible Charge Operator _____

License Number _____

Substitute Responsible Charge Operator _____

License Number _____

I certify that I am the owner of this public drinking water system, or legally designated to represent the owner of this public drinking water system, and that the responses provided herein are true and accurate.

Owner Signature _____ Date _____

Return completed form to: Attention: Joan Thomas, DEQ, 1410 N. Hilton, Boise, ID 83706 - you may use the mailer on the reverse side.

Keep a copy of this form for your records.

Post Office requires that this mailpiece be folded and sealed with pieces of tape on the right and the left edges along the top opening of the mailpiece - no staples please.

DEPARTMENT OF ENVIRONMENTAL QUALITY

1410 North Hilton
Boise, Idaho 83706-1290

Idaho PWS Responsible Charge Operator Report
Drinking Water Program

Fold Here

Effective JAN 23, 2006

Eleventh hour for systems with arsenic levels at or above 10 ppb

A Compliance Agreement Schedule can prevent violations/penalties

It is the eleventh hour for systems that must meet the revised MCL (maximum contaminant level) arsenic standard of 10 parts per billion.

The revised arsenic standard becomes effective January 23, 2006 - just 6 months away.

To assist owners of water systems in complying with the new standard, Idaho DEQ is offering an option for system owners to enter into a Compliance Agreement Schedule with DEQ.*

The Compliance Agreement Schedule is intended to provide a water system a reasonable schedule to complete modifications to the system that will reduce exposure to arsenic.

Entering into a compliance agreement (before the new MCL standard goes into effect on January 23, 2006) will prevent a system owner from accruing violations and penalties. After January 23, 2006, however, water systems that exceed the annual average of 10 ppb and that have not entered into an agreement with Idaho DEQ will be in violation of the new standard.

How to obtain a Compliance Agreement Schedule . . .

1. Check to see if your most recent arsenic results for your water system are above the 10 ppb MCL, or contact your regional or health district office if you are unsure.
2. ***If your system has exceeded the 10 ppb,*** hire an Idaho licensed professional engineer to evaluate your system.
3. Next, provide your local Idaho DEQ regional or health district office with the following items:
   - a reasonable engineering schedule by which your system will make the necessary modifications, including a proposed process for securing adequate funding, and
   - a letter addressed to DEQ requesting a meeting to discuss entering into a Compliance Agreement Schedule.

Other elements that will be included in the agreement are requirements for quarterly public notification to consumers, a public hearing allowing consumers to have input on the schedule, and annual meetings with Idaho DEQ to evaluate progress.

Idaho DEQ will need a signed Compliance Agreement Schedule no later than January 23, 2006, to ensure that violations and penalties do not accrue.

To make sure that there is adequate time to review agreements, **please submit the above materials no later than October 1, 2005.** ■

* *In May 2005, DEQ mailed letters to public water systems describing the Compliance Agreement Schedule process. Systems received a letter if they had one or more arsenic results above the new 10 ppb standard for arsenic for the period from January 1, 2002, to the present time.*

A REMINDER TO ALL COMMUNITY WATER SYSTEMS

2004 CCRs
due July 1, 2005

DEQ mailed CCR templates to all community water systems in April.

The DEQ template is also available on-line at http://www.deq.idaho.gov/water/assist_business/pws/ccr.cfm. Once there, drop down the page to "Options for Preparing Your 2004 CCR." The template can be downloaded to a computer and filled out.

Additional CCR information is available at the following EPA web sites:

- EPA's CCR i*W*riter template allows you to drop in information and print out a finished report. The CCR i*W*riter allows you to save the document and come back to it at a later date to finish the report if necessary. Site is located at http://www.ccriwriter.com/.
- EPA's "Preparing Consumer Confidence Reports - A Troubleshooting Guide" can be found at http://www.dep.state.pa.us/dep/deputate/watermgt/WSM/WSM_DWM/Complian/CCR-EPA-Trble_Gde.pdf.

Note: Only community water systems are required to submit an annual CCR. A community water system is a public water system that serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents (e.g., municipality, subdivision, mobile home park, apartment complex, or nursing home).

TRAINING SCHEDULE

Class/Sponsor	Location/Date
Secondary Contaminans *(BE)*	*Salmon, June 1*
Wetland Water *(BE)*	*Twin Falls, June 7-8*
Groudwater/Sourcewater Protection *(IRWA)*	*Lewiston, June 9*
VSWS Certification Review *(BE)*	*Sandpoint, June 14*
WW I-II Certification Review *(BE)*	*Post Falls, June 15-16*
Groundwater/Sourcewater Protection *(IRWA)*	*Lewiston, June 21*
Groundwater/Sourcewater Protection *(IRWA)*	*Lewiston, June 22*
Groundwater/Sourcewater Protection *(IRWA)*	*Twin Falls, June 28*
Lab Sampling *(BE)*	*Orofino, June 29*
Cross Connection Identification *(BE)*	*Orofino, June 30*
Groundwater/Sourcewater Protection *(IRWA)*	*American Falls, June 30*
VSWS Certification Review *(BE)*	*Nampa, July 6*
Groundwater/Sourcewater Protection *(IRWA)*	*Post Falls, July 7*
Lagoon Microbiology *(BE)*	*Rupert, July 11-12*
Groundwater/Sourcewater Protection *(IRWA)*	*Grangeville, July 12*
Groundwater/Sourcewater Protection *(IRWA)*	*Coeur d'Alene, July 14*
Basic Microbiology *(BE)*	*Driggs, July 14-15*

Class/Sponsor	Location/Date
Groundwater/Source Water Protection *(IRWA)*	*Soda Springs, July 27*
WW III&IV Certification Review *(BE)*	*Boise, August 3-4*
Groundwater/Source Water Protection *(IRWA)*	*Coeur d'Alene, Aug 9*
Groundwater/Source Water Protection *(IRWA)*	*Hayden, Aug 11*
SCADA *(BE)*	*Pocatello, Aug 16*
Land Application *(BE)*	*Twin Falls, Aug 17-18*
Groundwater/Source Water Protection *(IRWA)*	*Twin Falls, Aug 23*
Water I-II Certification Review *(BE)*	*Sandpoint, Aug 23-24*
Troubleshooting Water Systems *(BE)*	*Coeur d'Alene, Aug 25*
Groundwater/Source Water Protection *(IRWA)*	*Blackfoot, Aug 25*
Water I-II Certification Review *(BE)*	*Idaho Falls, Aug 30-31*

For further information, contact the following:

(BE) = Brown Environmental, Inc.
1-800-543-4358 or for the Boise area, 1-208-465-5725.
Web site: www.idahooperatortraining.com.

(IRWA) = Idaho Rural Water Association,
1-800-962-3257 or 1-208-343-7001.
Fax: 1-208-343-1866. E-mail: irwa@idahoruralwater.com.
Web site: www.idahoruralwater.com/index2.htm.

Costs associated with this publication are available from the Department of Environmental Quality. Cost per unit: $0.21 Printed on recycled paper.